

FILEDUnited States District Court
Albuquerque, New MexicoMitchell R. Elfers
Clerk of Court

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Mexico



United States of America

v.

Jeremy Isaac Lopez
(Year of Birth:1995)

Case No.

23mj714*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 19, 2023 in the county of Santa Fe in the
District of New Mexico, the defendant(s) violated:*Code Section*

21 U.S.C. § 841(a)(1) and (b)(1)(C)

*Offense Description*Possession with Intent to Distribute a Mixture and Substances Containing and
Detectable Amount of Methamphetamine

This criminal complaint is based on these facts:

See attached affidavit.

Complaint approved by AUSA Robert James Booth II.

☒ Continued on the attached sheet.*Complainant's signature*

Michelle A. Cobb, FBI Special Agent

Printed name and title

Sworn to telephonically and signed electronically.

Date: April 21, 2023City and state: Albuquerque, NM*Judge's signature*

Honorable Laura Fashing

Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Michelle A. Cobb, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is made in support of a Criminal Complaint and an application for an Arrest Warrant for JEREMY ISAAC LOPEZ, year of birth (YOB) 1995 (herein referred to as LOPEZ).

2. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI") and have been since January 2017. I am currently assigned to the Albuquerque Division, Santa Fe Resident Agency. During my employment with the FBI, I have conducted numerous investigations for suspected violations of federal law, including Indian Country crimes and crimes of violence. I have received training on how to conduct complex investigations and I have previously participated in the execution of arrest and search warrants involving federal violations.

3. This affidavit is based upon my personal knowledge, and upon information reported to me by other federal and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. Throughout this affidavit, reference will be made to law enforcement officers. Law enforcement officers are those federal and local law enforcement officers who have directly participated in this investigation, and with whom your affiant has had regular contact regarding this investigation. This affidavit is also based upon information gained from interviews with cooperating citizen witnesses, whose reliability is established separately herein.

4. Based on my training, experience, and the facts as set forth in this affidavit, I believe there is probable cause that JEREMY ISAAC LOPEZ knowingly possessed with intent to distribute a mixture and substance containing a detectable amount of methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

5. Because this affidavit is submitted for the limited purpose of securing authorization for a Criminal Complaint and an Arrest Warrant, I have not included each and every fact known to me concerning this investigation. This affidavit is intended to show that there is sufficient probable cause for the requested warrant.

PROBABLE CAUSE

6. On April 19, 2023, officers of the Pueblo of Pojoaque Tribal Police Department (PPTPD) were notified by FBI Task Force Officer (TFO) Byron Abeyta that LOPEZ's cellular telephone was registering near the Cities of Gold Casino, located at 10 Cities of Gold Rd, Santa Fe, NM 87506. TFO Abeyta had previously obtained a state search warrant in order to locate LOPEZ's cellular telephone related to his active arrest warrant. Officers of PPTPD knew LOPEZ to have recently visited casinos in the area and knew LOPEZ to have an active arrest warrant for failure to comply with his conditions of release related to a pending state armed robbery charge. Officers of PPTPD knew LOPEZ to be armed and dangerous, and to have recently led the Espanola Police Department (EPD) on a dangerous vehicle pursuit that resulted in LOPEZ driving into incoming traffic, running a red light, and ultimately evading EPD officers. This information was provided to PPTPD by FBI Agents prior to April 19, 2023.

7. On April 19, 2023, PPTPD officers were present in the Cities of Gold Casino when they received the notification from TFO Abeyta that LOPEZ's cellular telephone was

registering near the casino. PPTPD officers observed LOPEZ inside the Cities of Gold Casino. PPTPD officers followed LOPEZ and ANGELINA QUINTANA (YOB 1998) (herein referred to as QUINTANA) outside of the casino. LOPEZ got into the front driver's seat of a Black 2012 Chevrolet Camaro and QUINTANA got into the front passenger seat of the vehicle. PPTPD officers drew their firearms and gave LOPEZ and QUINTANA commands to exit the vehicle. LOPEZ put the vehicle in drive and accelerated forward, smashing into a parked vehicle. A PPTPD officer discharged his weapon, striking the vehicle's tire and disabling the vehicle. At that time, LOPEZ and QUINTANA were removed from the vehicle and placed into law enforcement custody.

8. A search incident to arrest by PPTPD officers located suspected illegal narcotics on the person of LOPEZ. LOPEZ was carrying approximately 12 grams of suspected methamphetamines, 7 grams of suspected heroin, 53 grams of suspected fentanyl, 27 grams of suspected suboxone, and 12 grams of suspected marijuana. Located inside LOPEZ's wallet were dozens of small, clear baggies. Based on my training and experience, these small, clear baggies are consistent with those used by drug traffickers to package and distribute illegal narcotics. Based on my training and experience, the drug quantities found in LOPEZ's possession coupled with the small, clear baggies, are consistent with distribution of illegal narcotics.

9. The suspected methamphetamines were field tested and tested positive for the presence of methamphetamine.

CONCLUSION

10. Based on the facts contained in this document, I believe there is probable cause that JEREMY ISAAC LOPEZ knowingly possessed with intent to distribute a mixture and substance containing a detectable amount of methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C). Assistant United States Attorney Robert James Booth II reviewed this affidavit for legal sufficiency.

Respectfully submitted,



Michelle A. Cobb
Special Agent
Federal Bureau of Investigation

Sworn telephonically and signed by electronic means on April 21, 2023:


THE HONORABLE LAURA FASHING
UNITED STATES MAGISTRATE JUDGE